INTRODUCTION

PWWG Co-Chairs

Dylan Gilbert
Privacy Policy
Advisor
*National Institute
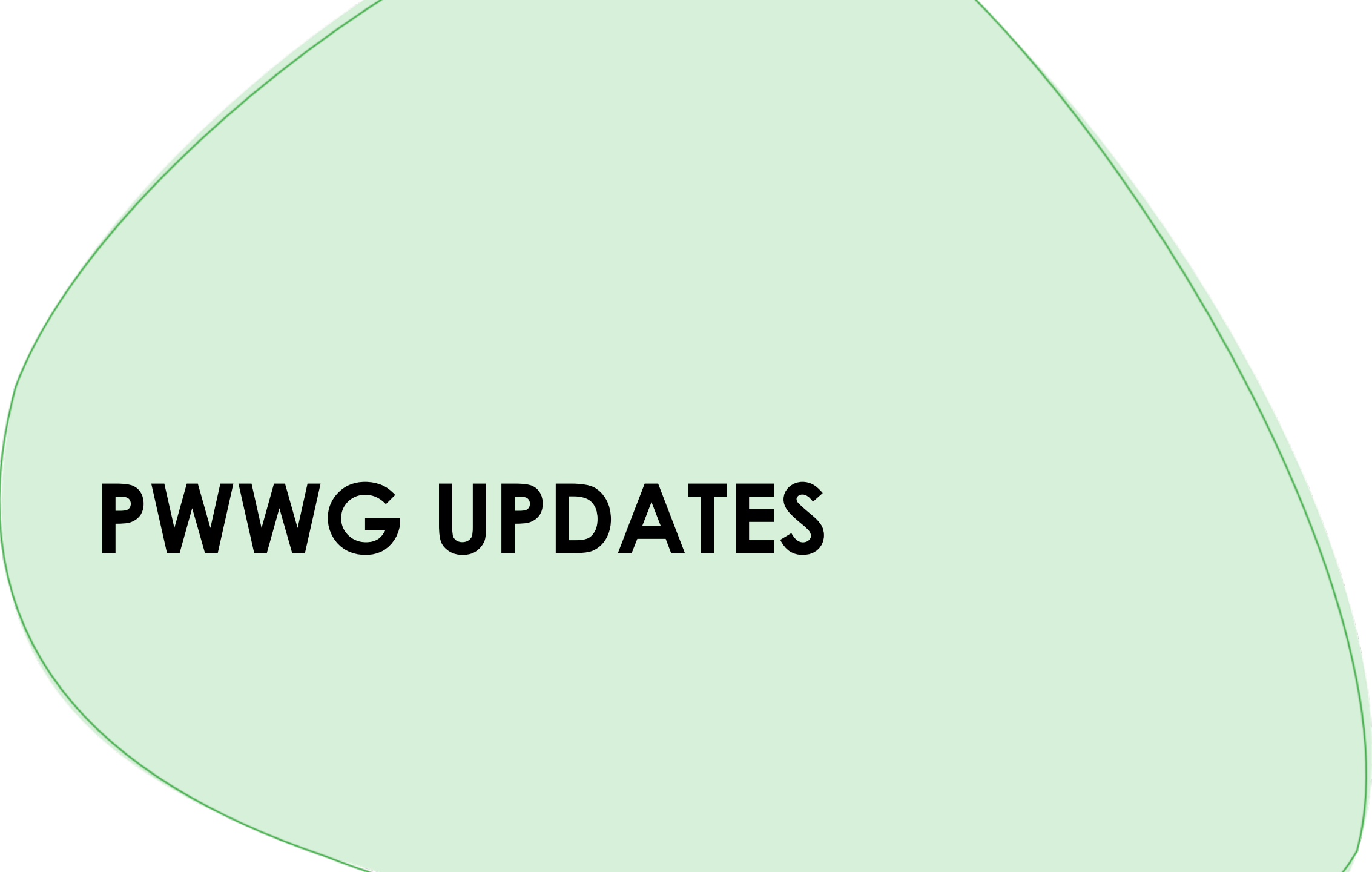of Standards and
Technology*

Doug Forman
Certification
Director
*International
Association of
Privacy
Professionals*

**Mary N. Chaney,
Esq., CISSP, CIPP/US**
Managing Attorney
*The Law Offices of
Mary N. Chaney,
PLLC*

Melanie Ensign
Founder & CEO
Discernable, Inc

PWWG UPDATES

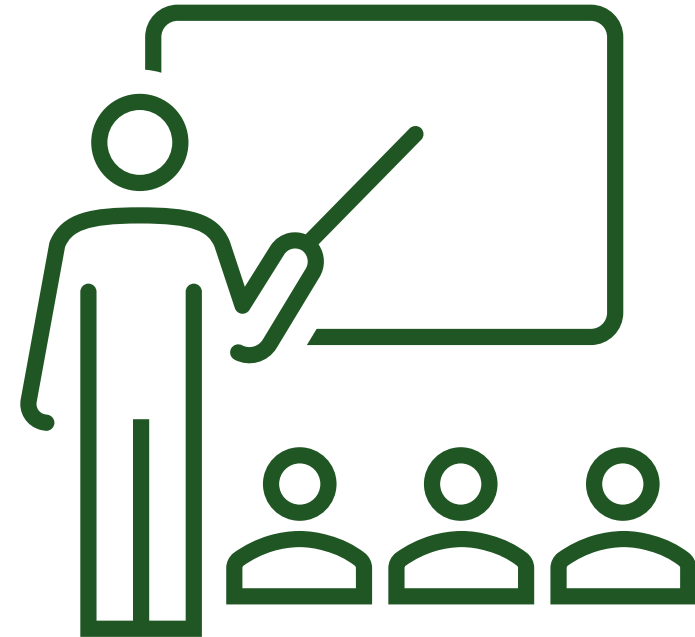# PWWG Updates
Progress to Date

- **Completed Project Teams:**
  - **Project Team 1:** Risk Assessment (ID.RA-P)
  - **Project Team 2:** Inventory and Mapping (ID.IM-P)

- **Active Project Teams:**
  - **Project Team 3:** Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P)
  - **Project Team 4:** Data Processing Ecosystem Risk Management (ID.DE-P)
  - **Project Team 5:** Business Environment (ID.BE-P)

- **TKS Documents** (Inventory Document and Mapping Document)

PWWG Updates
Key Challenges and Lessons Learned

- Conforming TKS Statements

- Achieving "Goldilocks" Level of Detail in TKS Statements

- Completing Work Quickly/Efficiently

PWWG Updates
Key Challenges and Lessons Learned
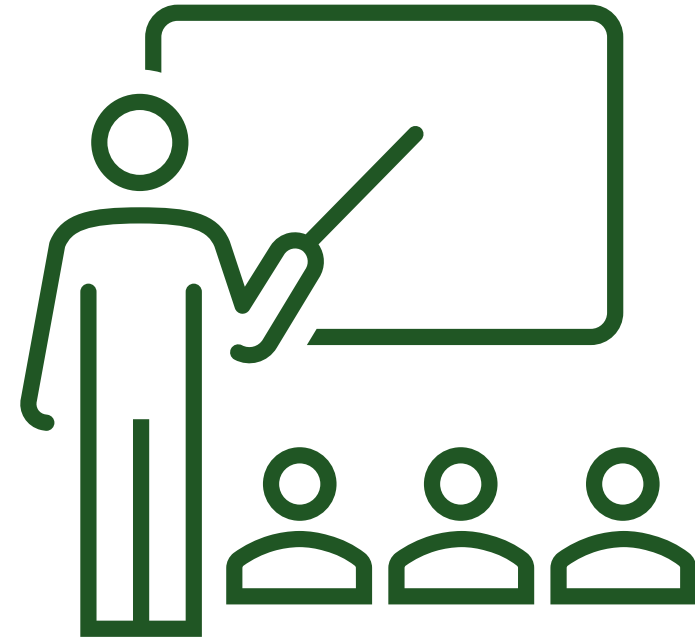
- **Conforming TKS Statements**

- Achieving "Goldilocks" Level of Detail in TKS Statements

- Completing Work Quickly/Efficiently

PWWG Updates
Conforming TKS Statements

T011: Coordinate with organizational stakeholders on activities necessary for determining how to assess the effectiveness of privacy controls.

T062: Engage with organization-defined stakeholders (e.g., through interviews and surveys).

K001: Knowledge of [organization-selected regulation-defined] roles of system/product/service and component owners or operators.
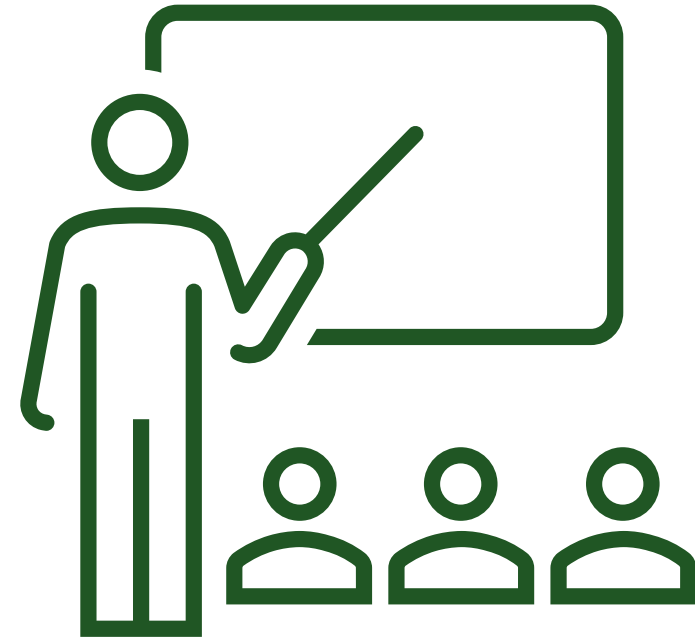
PWWG Updates
Key Challenges and Lessons Learned

- Conforming TKS Statements

- **Achieving "Goldilocks" Level of Detail in TKS Statements**

- Completing Work Quickly/Efficiently

PWWG Updates
Achieving "Goldilocks" Level of Detail in TKS Statements

- T006: Apply the privacy risk assessment approach (i.e., quantitative, qualitative, semi-quantitative) to the data actions of the organization's systems/products/services.

- T066: Evaluate the likelihood that identified problematic data actions of systems/products/services will create problems to individuals by applying the privacy risk assessment approach (i.e., quantitative, qualitative, semi-quantitative).

PWWG Updates
Key Challenges and Lessons Learned

- **Conforming TKS Statements**

- Achieving "Goldilocks" Level of Detail in TKS Statements

- **Completing Work Quickly/Efficiently**
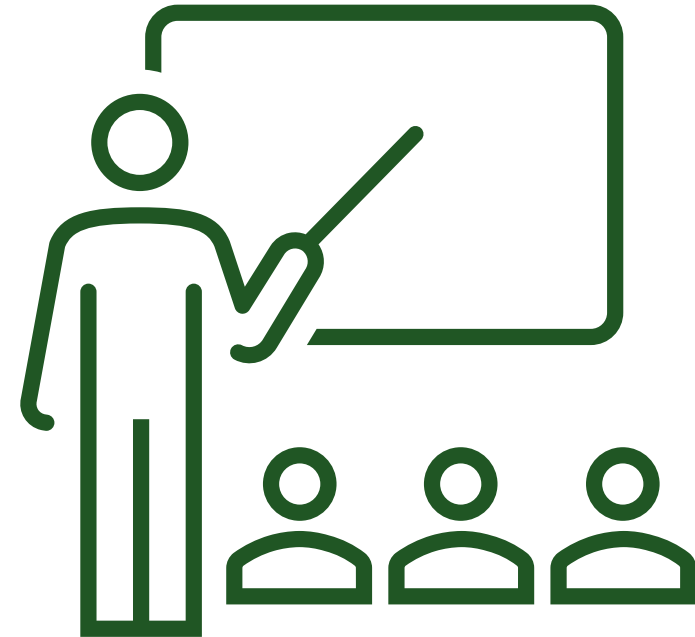
GOALS AND CHANGES FOR 2023

Goals for 2023

- **Complete TKS Statement Creation by January 1, 2024**

  o All Privacy Framework Categories complete

  o Conformance to standardized style, tone, etc.

  o Incorporation of NICE TKS Statements

Goals for 2023
TKS Conformity

- **Initial Plan:**
  - PWWG Conformance Committee

- **Revised Plan:**
  - NIST Team will lead on conformance

Goals for 2023
Remaining Project Teams

- **PT6:** Risk Management Strategy (GV.RM-P)
- **PT7:** Awareness and Training (GV.AT-P)
- **PT8:** Monitoring and Review (GV.MT-P)
- **PT9:** Data Processing Management (CT.DM-P)
- **PT10:** Disassociated Processing (CT.DP-P)
- **PT11:** Data Processing Awareness (CM.AW-P)

Goals for 2023
Target Timeline for Remaining Categories

February 1 – April 30, 2023

- Current Project Teams complete their work
- Project Team 6 - 8 Leads are finalized
- PT6 – 8 orientations are completed
- Completed TKS are conformed to standardized rules
- Begin incorporating NICE TKS to PWWG

May 1 – July 31, 2023

- Project Teams 6 – 8 complete their work
- Project Team 9 – 11 Leads are finalized
- PT 9 -11 orientations are completed
- Completed TKS are conformed to standardized rules
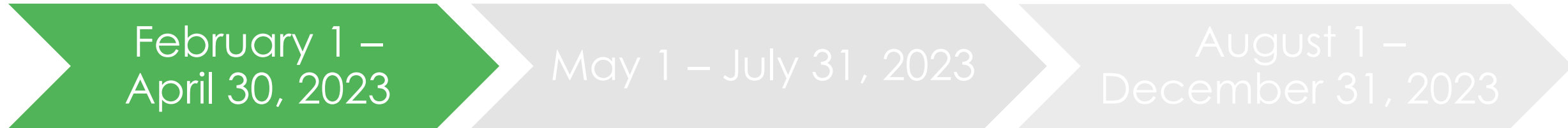- NICE TKS are incorporated into PWWG work

August 1 – December 31, 2023

- Project Teams 9 – 11 complete their work
- Completed TKS are reviewed for conformity to rules
- Process and timeline are finalized for public comments/workshop(s), etc. to finalize TKS in 2024

Goals for 2023
Target Timeline for Remaining Categories

February 1 – April 30, 2023	May 1 – July 31, 2023	August 1 – December 31, 2023

- Current Project Teams complete their work
- Project Team 6 - 8 Leads are finalized (Co-Chairs)
- PT6 – 8 orientations are completed (NIST team)
- Completed TKS are conformed to standardized rules (NIST team)
- Begin incorporating NICE TKS to PWWG (PWWG Sprint Team)

Goals for 2023
Target Timeline for Remaining Categories

February 1 – April 30, 2023 | May 1 – July 31, 2023 | August 1 – December 31, 2023

- Project Teams 6 – 8 complete their work
- Project Team 9 – 11 Leads are finalized (Co-Chairs)
- PT 9 -11 orientations are completed (NIST team)
- Completed TKS are conformed to standardized rules (NIST team)
- NICE TKS are incorporated into PWWG work (PWWG Sprint Team and NIST Team)

Goals for 2023
Target Timeline for Remaining Categories

February 1 – April 30, 2023	May 1 – July 31, 2023	August 1 – December 31, 2023

- Project Teams 9 – 11 complete their work
- Completed TKS are reviewed for conformity to rules (NIST Team)
- Process and timeline are finalized for public comments/workshop(s), etc. to finalize TKS in 2024 (NIST Team)

Changes for 2023
New Project Team Procedures

- TKS Workbook will be prepopulated with applicable TKS Statements from completed Project Teams
  - Notional TKS Statements
  - Completed TKS Statements

- Project Teams Leads and Co-Chairs will generate initial set of TKS Statements for Team review
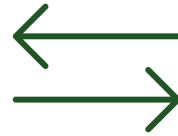
PAQ: Potentially Asked Questions

Q: Will Project Team Members still be able to suggest new TKS Statements?

A: Yes, both in real time during PT meetings and via comments in the TKS Workbook in between meetings.

Q: Will these changes affect current Project Teams?

A: Except for the April 30th deadline to complete their work, all other changes are optional for current Project Teams.

Q: How do these changes affect the work we've already completed?

A: To the extent that there are inconsistencies among completed TKS Statements (e.g., style, tone, etc.), those will be standardized by the NIST Team.

Next Steps

Next Steps
Member Survey

- **Future PWWG Project Teams**
  - Surveying interest in subject matter of future Project Teams

- **NICE Framework/Protect-P TKS Statements Activity**
  - Sign up for "sprint team" to sort NICE TKS Statements into Protect-P subcategories

PROJECT TEAM UPDATES

PROJECT TEAM 3:
Policies, Processes, and Procedures
(GV.PO-P, CT.PO-P, CM.PO-P)

Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P)
Team Co-Leads

Dan LoPresto
Director, Privacy Compliance
University of Central Florida
(UCF)

Nandita Rao Narla
Senior Privacy Program Manager
DoorDash

Alicia Christensen, JD, MS, CIPP/US, CIPM
VP, General Counsel, Chief Compliance
Officer at National Jewish Health
Principal Advisor, Frame Privacy Group

Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P)
Scope of Work

NIST PWWG Project Team 3 (PT3):
Policies, Processes, and Procedures

1) Function: GOVERN-P (GV-P):
- Category (GV.PO-P): Governance Policies, Processes, and Procedures
- Subcategories (6): GV.PO-P1 through GV.PO-P6

2) Function: CONTROL-P (CT-P):
- Category (CT.PO-P): Data Processing Policies, Processes, and Procedures
- Subcategories (4): CT.PO-P1 through CT.PO-P4

3) Function: COMMUNICATE-P (CM-P):
- Category (CM.PO-P): Communication Policies, Processes, and Procedures
- Subcategories (2): CM.PO-P1 and CM.PO-P2

Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P)
Scope of Work: Privacy Framework

NIST Privacy Framework Core		
Function	**Category**	**Subcategory**
GOVERN-P (GV-P): Develop and implement the organizational governance structure to enable an ongoing understanding of the organization's risk management priorities that are informed by privacy risk.	**Governance Policies, Processes, and Procedures (GV.PO-P):** The policies, processes, and procedures to manage and monitor the organization's regulatory, legal, risk, environmental, and operational requirements are understood and inform the management of privacy risk.	GV.PO-P1: Organizational privacy values and policies (e.g., conditions on data processing such as data uses or retention periods, individuals' prerogatives with respect to data processing) are established and communicated.
		GV.PO-P2: Processes to instill organizational privacy values within system/product/service development
		GV.PO-P3: Roles and responsibilities for the workforce are established with respect to privacy.
		GV.PO-P4: Privacy roles and responsibilities are coordinated and aligned with third-party stakeholders (e.g., service providers, customers, partners).
		GV.PO-P5: Legal, regulatory, and contractual requirements regarding privacy are understood and managed.
		GV.PO-P6: Governance and risk management policies, processes, and procedures address privacy risks.
CONTROL-P (CT-P): Develop and implement appropriate activities to enable organizations or individuals to manage data with sufficient granularity to manage privacy risks.	**Data Processing Policies, Processes, and Procedures (CT.PO-P):** Policies, processes, and procedures are maintained and used to manage data processing (e.g., purpose, scope, roles and responsibilities in the data processing ecosystem, and management commitment) consistent with the organization's risk strategy to protect individuals' privacy.	CT.PO-P1: Policies, processes, and procedures for authorizing data processing (e.g., organizational
		CT.PO-P2: Policies, processes, and procedures for enabling data review, transfer, sharing or disclosure,
		CT.PO-P3: Policies, processes, and procedures for enabling individuals' data processing preferences and
		CT.PO-P4: A data life cycle to manage data is aligned and implemented with the system development life cycle to manage systems.
COMMUNICATE-P (CM-P): Develop and implement appropriate activities to enable organizations and individuals to have a reliable understanding and engage in a dialogue about how data are processed and associated privacy risks.	**Communication Policies, Processes, and Procedures (CM.PO-P):** Policies, processes, and procedures are maintained and used to increase transparency of the organization's data processing practices (e.g., purpose, scope, roles and responsibilities in the data processing ecosystem, and management commitment) and associated privacy risks.	CM.PO-P1: Transparency policies, processes, and procedures for communicating data processing purposes, practices, and associated privacy risks are established and in place.
		CM.PO-P2: Roles and responsibilities (e.g., public relations) for communicating data processing purposes, practices, and associated privacy risks are established.

Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P)
Progress Update

- **Accomplishments (Completed Subcategories)**
  - Completed GV.PO-P1 – GV.PO-P6
  - Completed review of Co-Chair feedback for TKS Statements for GV.PO-P1 - GV.PO-P6
  - Completed CT.PO-P1 and CT.PO-P2

- **Challenges**
  - Time. Managing group discussions such that we remain focused on TKS statements related and aligned with Subcategory statements.

- **Lessons Learned**
  - Lessons Learned: To gain efficiency, Co-leads drafting TKS statements in advance of the group meeting then in group discussion we refine the TKS statements.

Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P)
Goals for February

- **Current Status**
  - Currently working on drafting TKS statements for :
    - **CT.PO-P**: Data Processing Policies, Processes, and Procedures.
      - **CT.PO-P3:** Policies, processes, and procedures for enabling individuals' data processing preferences and requests are established and in place.

- **Goals for this work period:**
  - Complete drafting TKS statements for CT.PO-P3
  - Begin drafting TKS statements for CT.PO-P4

Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P)
Recurring Meetings

- Biweekly on Thursdays from 1:00 PM ET to 2:00 PM ET

- Next meeting:
  - **Thursday, February 16, 2023**

Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P)
Mailing List Sign-Up

PrivacyWorkforcePT3+subscribe@list.nist.gov

PROJECT TEAM UPDATES

PROJECT TEAM 4:
Data Processing Ecosystem
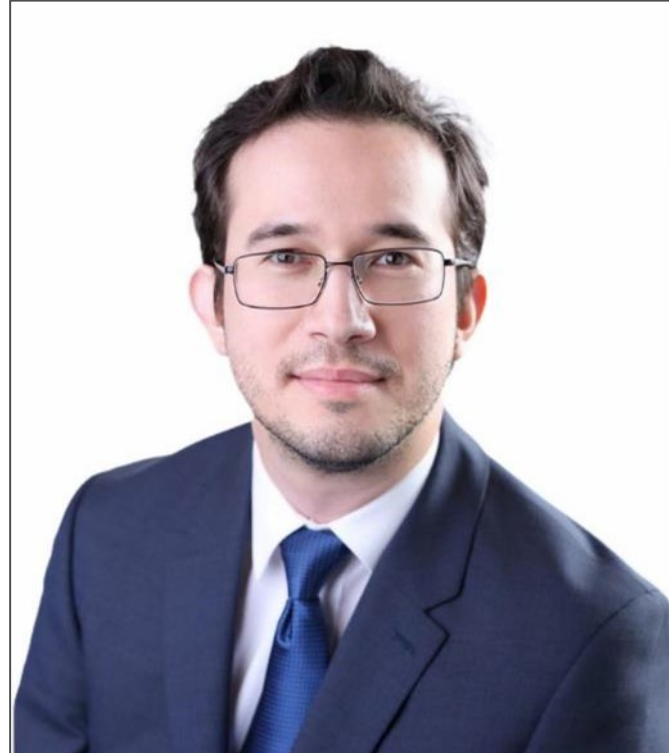## Risk Management (ID.DE-P)

Project Team 4: Data Processing Ecosystem (ID.DE-P)
Team Co-Leads

Tahir Latif
Head of Practice - Data Protection,
Artificial Intelligence and Analytics
(APAC & EMEA) Cognizant
Worldwide

Paul Lanois
Director, Fieldfisher

Anne Connell
Senior Cybersecurity Engineer,
Software Engineering Institute
Carnegie Mellon University

Project Team 4: Data Processing Ecosystem (ID.DE-P)
Task, Knowledge, Skill Statements (TKS)

Project Team 4:
- ### Task, Knowledge, and Skill (TKS) Statements
  - ### Subcategories

Subcategory	Description
ID.DE-P1:	Data processing ecosystem risk management policies, processes, and procedures are identified, established, assessed, managed, and agreed to by organizational stakeholders.
ID.DE-P2:	Data processing ecosystem parties (e.g., service providers, customers, partners, product manufacturers, application developers) are identified, prioritized, and assessed using a privacy risk assessment process.
ID.DE-P3:	Contracts with data processing ecosystem parties are used to implement appropriate measures designed to meet the objectives of an organization's privacy program.
ID.DE-P4:	Interoperability frameworks or similar multi-party approaches are used to manage data processing ecosystem privacy risks.
ID.DE-P5:	Data processing ecosystem parties are routinely assessed using audits, test results, or other forms of evaluations to confirm they are meeting their contractual, interoperability framework, or other obligations.

Project Team 4: Data Processing Ecosystem (ID.DE-P)
Progress Update

- **Accomplishments (Completed Subcategories)**
  - Completed ID.DE-P1 and ID.DE-P2
  - Submitted ID.DE-P1 and ID.DE-P2 to PWWG Co-Chairs. (Awaiting review)

Project Team 4: Data Processing Ecosystem (ID.DE-P)
Goals for February

- **Current Status**
  - Currently working on drafting TKS statements for :
  - **ID.DE-P3**: Contracts with data processing ecosystem parties are used to implement appropriate measures designed to meet the objectives of an organization's privacy program.

- **Goals for this work period:**
  - Complete drafting TKS statements for ID.DE-P3.
  - Begin drafting TKS statements for ID.DE-P4.
  - Review Co-Chair feedback for TKS Statements for ID.DE-P2.

Project Team 4: Data Processing Ecosystem (ID.DE-P)
Recurring Meetings

Meetings each month:

- Biweekly on Thursdays **|** 2:00 PM to 3:00 PM ET

- Next meeting:

  Thursday, February 9, 2023 | 2:00 PM – 3:00 PM ET

Project Team 4: Data Processing Ecosystem (ID.DE-P)
Mailing List Sign-Up

PrivacyWorkforcePT4+subscribe@list.nist.gov

PROJECT TEAM UPDATES

PROJECT TEAM 5:
Business Environment (ID.BE-P)

Project Team 5: Business Environment (ID.BE-P)
Team Co-Leads

Anshu Gupta
VP, Security and Privacy, CISO
Span.io

Brandi M. Bennett, CIPP-US
Data Privacy and Security
Attorney

Project Team 5: Business Environment (ID.BE-P)
Task, Knowledge, Skill Statements (TKS)

- **Project Team 5 (PT5):**
  - **Subcategories**

Subcategory	Description
ID.BE-P1:	The organization's role(s) in the data processing ecosystem are identified and communicated.
ID.BE-P2:	Priorities for organizational mission, objectives, and activities are established and communicated.
ID.BE-P3:	Systems/products/services that support organizational priorities are identified and key requirements communicated.

Project Team 5: Business Environment (ID.BE-P)
Progress Update

- **Accomplishments (Completed Subcategories)**
  - Completed ID.BE-P1
  - Submitted ID.BE-P1 to PWWG Co-Chairs. (Awaiting review)

Project Team 5: Business Environment (ID.BE-P)
Goals for February

- **Current Status**
  - Complete drafting TKS Statements for ID.BE-P2.

- **Goals for this work period:**
  - Review Co-Chair feedback for ID.BE-P1 Task and Knowledge Statements when Co-Chairs complete their review.
  - Submit ID.BE-P2 to PWWG Co-Chairs.
  - Begin drafting TKS Statements for ID.BE-P3

Project Team 5: Business Environment (ID.BE-P)
Recurring Meetings

- Two meetings each month:
    - Bi-weekly on Tuesdays **|** 1:00 PM to 2:00 PM ET

- Next meeting:
    - **Tuesday, February 14, 2023 | 1:00 PM – 2:00 PM ET**

Project Team 5: Business Environment (ID.BE-P)
Mailing List Sign-Up

Project Team 5 is currently looking for more participants to join this effort. If you are available to join PT5 to contribute your expertise, please email:

PrivacyWorkforcePT5+subscribe@list.nist.gov

NEXT STEPS & UPCOMING MEETINGS

Privacy Workforce Public Working Group
Upcoming Meetings

Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CM.PO-P, CT.PO-P)
    Thursday, February 16, 2023 | 1:00pm – 2:00pm ET

Project Team 4: Data Processing Ecosystem Risk Management (ID.DE-P)
    Thursday, February 9, 2023 | 2:00pm – 3:00pm ET

Project Team 5: Business Environment (ID.BE-P)
    Tuesday, February 14, 2023 | 1:00pm – 2:00pm ET

NIST Privacy Workforce Public Working Group
    Wednesday, March 8, 2023 |1:00pm – 2:00pm ET

* For updated meeting schedules see the PWWG web page.

Privacy Workforce Public Working Group
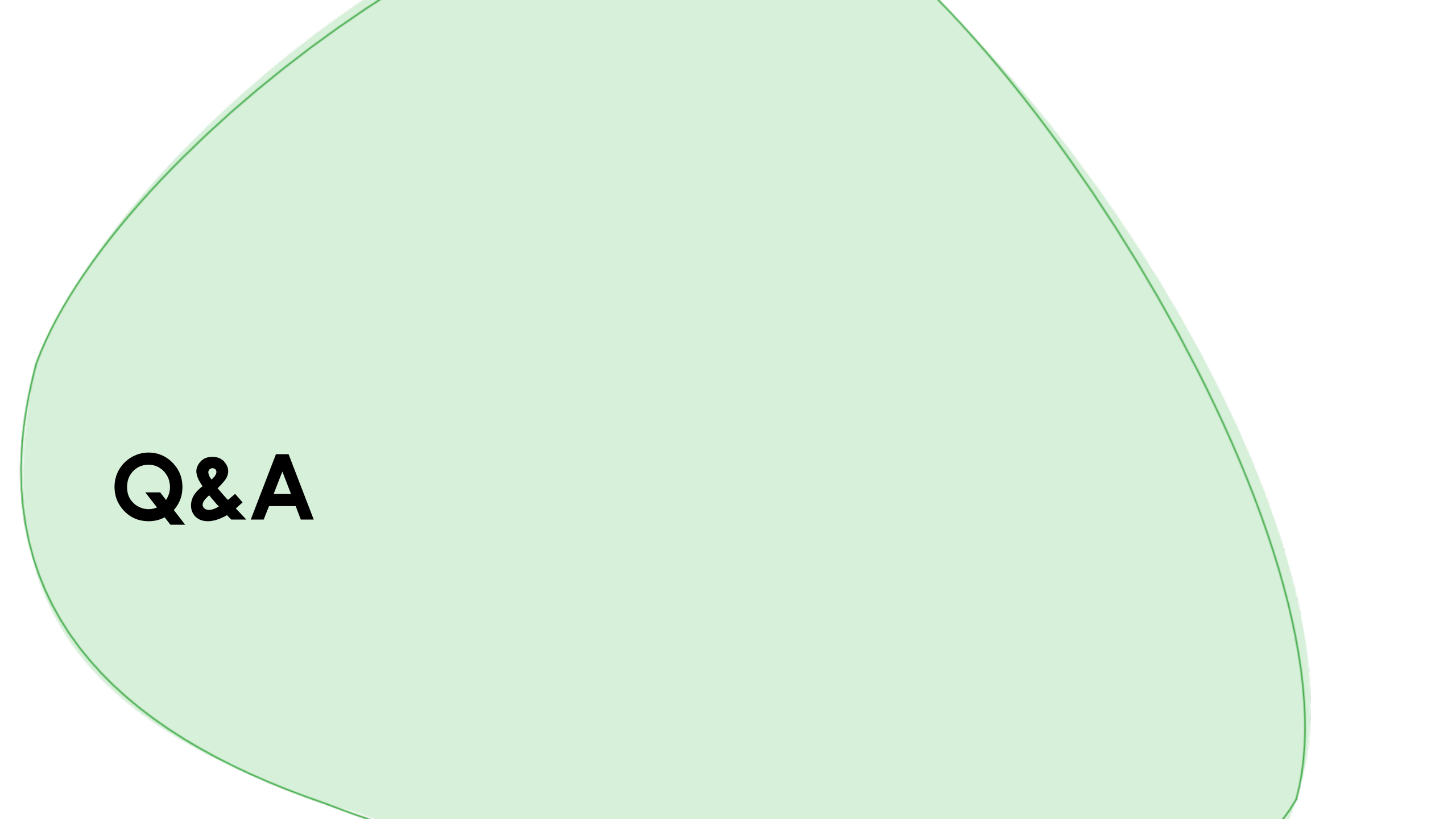## Join Our Mailing Lists

- Privacy Workforce Working Group (PWWG): PrivacyWorkforceWG+subscribe@list.nist.gov

- Project Team 3 (PT3):PrivacyWorkforcePT3+subscribe@list.nist.gov
- Project Team 4 (PT4):PrivacyWorkforcePT4+subscribe@list.nist.gov
- Project Team 5 (PT5):PrivacyWorkforcePT5+subscribe@list.nist.gov

- **All mailing lists are moderated**

Privacy Workforce Public Working Group
Troubleshooting

- Email questions to pwwg@nist.gov

Q&A